

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

GLOBAL FORCE)
ENTERTAINMENT, INC. and)
JEFFREY JARRETT)
Plaintiffs/)
Counter-Defendants,) CIVIL ACTION NO.
v.) 3:18-cv-00749
)
ANTHEM WRESTLING)
EXHIBITIONS, LLC,)
Defendant/)
Counter-Plaintiff.)

--- This is the Videotaped Deposition of
LEONARD ASPER, taken at the offices Neesons, a
Veritext Company, 77 King Street West, Suite
2020, Toronto, Ontario, Canada, on the 13th day
of November, 2019.

1 question without interrupting me and I will give
2 you the same courtesy of responding without
3 interrupting you, is that okay?

4 A. Yes.

5 Q. Normally I would say this is not
6 a sprint type of deposition, that it's a
7 marathon, but I understand that you have time
8 commitments and you need to leave around 1:30
9 today, eastern?

10 A. Yes.

11 Q. Is there anything about your
12 physical, mental or emotional condition today
13 that will not allow you to understand my
14 questions, answer them completely and answer
15 them truthfully?

16 A. No.

17 Q. Are you currently employed?

18 A. Yes.

19 Q. By whom are you employed?

20 A. Directly by Sygnus Holdings,
21 Sygnus Corporation.

22 Q. How do you spell "Sygnus"?

23 A. S-Y-G-N-U-S.

24 Q. Are you employed by anyone else?

25 A. I'm not employed. I'm a

1 contractor to Anthem Sports and Entertainment.

2 Q. When you say Anthem Sports and
3 Entertainment is that Anthem Sports and
4 Entertainment Corp.?

5 A. I'm not sure. I believe it's
6 Inc., Anthem Sports and Entertainment, Inc.

7 Q. Is that a Canadian company or an
8 American company?

9 A. No, it's a Delaware company.

10 Q. It's a Delaware company.

11 A. If I'm not wrong it's either that
12 or a corporation, which is the Ontario company.
13 So you can check that.

14 Q. So let me ask again, because this
15 may be my only opportunity to depose you.

16 A. Okay.

17 Q. So you're employed by Sygnus, you
18 have an independent contractor relationship with
19 Anthem Sports and Entertainment, Delaware?

20 A. Yes.

21 Q. And that may be Inc., it may be
22 Corp. but it's a Delaware company?

23 A. Yes.

24 Q. Do you have an employment or
25 independent contract relationship with any other

1 in Delaware.

2 Q. So the Canadian company is Anthem
3 Sports and Entertainment Corp., the Delaware
4 company is Anthem Sports and Entertainment,
5 Inc.?

6 A. Yes.

7 Q. I'm just trying to keep this --

8 A. I'm trying to remember now. I
9 actually believe that Sygnus -- I'm trying to
10 remember now.

11 Can I produce a document that gives
12 you a corporate structure after this? They're
13 owned through various subsidiaries so I'm not
14 sure which.

15 Q. We're happy to accept that
16 document.

17 A. Yeah.

18 Q. And we can add it as a late-filed
19 exhibit but I'm not going to assign a number to
20 it right just now for simplicity. Is that okay?

21 A. Okay.

22 Q. So as you sit here today without
23 that document, Sygnus owns Anthem Sports and
24 Entertainment, the Canadian company; Anthem
25 Sports and Entertainment, the Delaware company,

1 Canada.

2 Q. Does Anthem Sports and
3 Entertainment Canada have any offices?

4 A. Yes.

5 Q. Where are those offices located?

6 A. In Toronto.

7 Q. Are they located anywhere outside
8 Toronto?

9 A. No.

10 Q. Is there an office of Anthem
11 Sports and Entertainment Canada in New York
12 City, for example?

13 A. No.

14 Q. And I think I asked you if there
15 are any employees of Anthem Sports and
16 Entertainment, Delaware?

17 A. Not to my knowledge.

18 Q. Does Anthem Sports and
19 Entertainment Delaware have any offices?

20 A. No.

21 Q. What is the operational
22 relationship between Anthem Sports and
23 Entertainment Canada and Anthem Sports and
24 Entertainment Delaware?

25 A. There's no operational

1 relationship, it's just pure structural and a
2 corporate one.

3 Q. They're just shells? Is that
4 pretty much --

5 A. I'm trying to -- I'm trying to
6 remember which one actually the employees are
7 in, but it houses the main corporate group of --
8 that runs the company.

9 Q. Who would know the answer to the
10 question about where the employees are?

11 A. Ed Nordholm.

12 Q. I'll ask him.

13 What, if anything, is Anthem Sports
14 Exhibitions, LLC?

15 A. Pardon me?

16 Q. Sorry, what, if anything, is
17 Anthem Wrestling Exhibitions, LLC?

18 A. Before you leave, just I can say
19 I believe, but I believe the employees are
20 employed by the Canadian company and the
21 Canadian company provides services to the U.S.
22 company.

23 Q. Is there a services agreement, a
24 written services agreement between Anthem Sports
25 and Entertainment, Canada, and Anthem Sports and

1 TV channel, that's owned by Anthem.

2 Q. So the Fight Media Group, where's
3 that based?

4 A. Toronto.

5 Q. Does it have any employees?

6 A. Yes, it does.

7 Q. Who are its employees?

8 A. There would be a group of about
9 seven or eight of them. I'm not sure it would
10 be people -- do you want the names?

11 Q. Yes.

12 A. I could name some but not all.
13 George Barboza [ph] would be one, Albert
14 Vartenian, Ariel Shnerer .

15 Q. Anyone else?

16 A. Glen McDonald.

17 Q. Anyone else?

18 A. I think I would rather just
19 provide a chart because employees have gone
20 from -- have changed from asset to asset.

21 So some have -- when we set up a new
22 channel, for example, some left one and started
23 at the other. So I don't keep tabs on the exact
24 employees of Fight Network.

25 There's a dedicated group of people

1 who work solely for Fight Network.

2 Q. Is there a corporate flow chart,
3 or a chart, organizational chart that you guys
4 keep?

5 A. Yes. I'm not sure it's
6 up-to-date but we do generally keep one, yes.

7 Q. How do you determine which
8 employees are working for which company at which
9 time?

10 A. What they do during the day.

11 Q. Are the Fight Media --

12 A. So there would be dedicated
13 employees to specific businesses that only work
14 for that business, and then there would be other
15 employees, like this chief financial officer,
16 who would do work for each of the businesses,
17 obviously, and his time would be allocated.

18 Q. Do you have any title -- I'm
19 sorry, I didn't mean to interrupt you.

20 A. Go ahead.

21 Q. The Fight Media, you said it's
22 called Fight Media LLC? Or what is the full
23 name?

24 A. I believe it's Fight Media Group
25 Inc..

1 or had a relationship with Anthem Sports and
2 Entertainment Delaware?

3 A. From the time it was
4 incorporated. I don't remember when it was
5 incorporated.

6 Q. What, if anything, does Anthem
7 Sports and Entertainment Delaware do?

8 A. It oversees the operations of its
9 subsidiaries. It carries on business as a -- as
10 compared to Anthem Sports and Entertainment
11 Corp. -- I'm not sure what you mean by "do".

12 Q. What does the company do?

13 A. It operates its businesses.

14 Q. Okay. What are its businesses?

15 A. Its businesses are the
16 subsidiaries, Fight Network et al., Game Plus,
17 Game TV. It either manages them or provides
18 services to them.

19 Q. Anthem Sports -- does Anthem
20 Sports and Entertainment Delaware own any
21 companies outside of the U.S.?

22 A. I'm not familiar with our
23 corporate structure. I'm sorry, I don't know
24 the answer to that.

25 Q. Do you have an external title

1 employee or were independent contractors?

2 A. No, they wouldn't and they're not
3 expected.

4 Q. And they wouldn't know that there
5 were 70 employees in Toronto or 70 independent
6 contractors, is that fair?

7 A. Technically, but it would be
8 unusual for a company to describe all -- if it
9 had only independent contractors to say -- to
10 not say that in a document like this.

11 But everybody in reading this would
12 know, at least in our business, that there would
13 be a variety of relationships with the company.

14 Q. I'm going to show you page 10.
15 According to page 10 of Exhibit 2 it says:

16 "Leonard Asper is the chief
17 executive officer of Anthem Sports and
18 Entertainment Corp."

19 Is that accurate?

20 A. Yes.

21 Q. And it says that:

22 "Ed Nordholm is the executive
23 vice-president and president of Impact
24 Wrestling. "

25 Is that correct?

1 A. That's correct that it says that,
2 yes.

3 Q. Is that accurate?

4 A. Yes. In the sense that he
5 provides -- he is the president of Impact
6 Wrestling and provides services to Anthem.

7 Q. Who, if anyone, is Niral
8 Merchant?

9 A. He's the providing -- he's the
10 CFO, chief financial officer.

11 Q. He's the CFO of Anthem Sports and
12 Entertain Corp., Canadian?

13 A. Yes.

14 Q. Is there a chief financial
15 officer for Anthem Wrestling Exhibitions, LLC?

16 A. There's no one who holds that
17 specific title, but there's a -- I'm not sure of
18 the title of the person -- there's an account at
19 Impact Wrestling, but I don't know the title.

20 Q. Who would be the person most
21 knowledgeable of the flow-through of revenues and
22 profits from Anthem Wrestling Exhibitions to
23 Anthem Sports and Entertainment?

24 A. Well, either of Ed or Niral, but
25 I'm not sure what you mean by "flow-through

REPORTER'S CERTIFICATE

I, HELEN MARTINEAU, CSR, Certified
Shorthand Reporter, certify;

That the foregoing proceedings were
taken before me at the time and place therein
set forth at which time the witness was put
under oath by me;

That the testimony of the witness and
all objections made at the time of the
examination were recorded stenographically by me
and were thereafter transcribed;

That the foregoing is a true and
accurate transcript of my shorthand notes so
taken. Dated this 24th day of November, 2019.

A handwritten signature in blue ink, appearing to read "H. Martineau", is written over a horizontal line.

PER: HELEN MARTINEAU
CERTIFIED SHORTHAND REPORTER